

EXHIBIT 51

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7

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 ROBERT HUNTER BIDEN,
11

12 Plaintiff,
13

14 vs.
15

16 PATRICK M. BYRNE,
17 Defendant.
18

Case No.: 2:23-cv-09430-SVW-PD
Judge: Honorable Stephen V. Wilson
Courtroom: 10A

**DEFENDANT PATRICK M.
BYRNE'S FURTHER RESPONSES
TO SPECIAL INTERROGATORIES,
SET ONE, TO PLAINTIFF
ROBERT HUNTER BIDEN**

Complaint Filed: November 8, 2023

1 **PROPOUNDING PARTY:** Plaintiff, ROBERT HUNTER BIDEN

2 **RESPONDING PARTY:** Defendant, PATRICK M. BYRNE

3 **SET NO.:** Set One (1)

4 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

5 Defendant Patrick M. Byrne ("Responding Party") hereby responds to the
6 Special Interrogatories, Set One, propounded by Plaintiff Robert Hunter Biden
7 ("Propounding Party") as follows:

8 **PRELIMINARY STATEMENT**

9 1. It is to be noted that this Responding Party has not fully completed
10 investigation of the facts, discovery, and preparation for the trial of this case. The
11 following responses are based only on such information and documents which are
12 presently available to and specifically known to this responding party and discloses
13 only those contentions presently known to the responding party. It is anticipated
14 that further discovery, independent investigation, legal research, and analysis will
15 supply additional facts, add meaning to the known facts, as well as establish
16 entirely new factual conclusions and legal contentions. This discovery,
17 independent investigation, legal research, and analysis may lead to additions,
18 changes and/or variations from the contentions set forth herein.

19 2. The following responses are given without prejudice to the
20 Responding Party's right to produce any subsequently discovered evidence which
21 this Responding Party may later recall. The Responding Party reserves the right to
22 change any and all of the following responses as additional facts are ascertained,
23 legal research is completed and analysis and contentions are made. The following
24 responses are made in good faith to supply factual information and as much
25 specification of legal contentions as are presently known, but shall in no way
26 prejudice the responding party in relation to further discovery, research or analysis.

27 **GENERAL OBJECTIONS**

28 1. The objections below are incorporated into the Responding Party's

1 responses, whether or not specific reference is made to such objection in the
2 response to a particular request.

3 2. This answering party objects generally to each request to the extent it
4 seeks the disclosure of information protected by the attorney-client privilege.

5 3. This answering party objects generally to each request to the extent it
6 seeks disclosure of information protected by the attorney-work product doctrine.

7 4. This answering party objects generally to each of the "Definitions"
8 contained in Special Interrogatories, Set One on the grounds that such
9 "Definitions" are vague, ambiguous, overbroad, compound, unduly burdensome,
10 assumes facts not in evidence and denied, oppressive, and if interpreted literally,
11 impossible to answer and Plaintiff is using said "Definitions" to try and evade in
12 bad faith the limit of 25 interrogatories that he can propound on the answering
13 party pursuant to the provisions of Federal Rule of Civil Procedure §33(a)(1) and
14 will not use them to respond to these interrogatories.

15 5. This answering party objects generally to each of the "Instructions"
16 contained in Special Interrogatories, Set One on the grounds that such
17 "Instructions" are vague, ambiguous, overbroad, compound, unduly burdensome,
18 assumes facts not in evidence and denied, and oppressive, and if interpreted
19 literally, impossible to comply with and Plaintiff is using the "Instructions" to try
20 and evade in bad faith the limit of 25 interrogatories that he can propound on the
21 answering party pursuant to the provisions of Federal Rule of Civil Procedure
22 §33(a)(1) and will not use them to respond to these interrogatories.

23 6. This answering party objects generally to each request as vague and
24 ambiguous to the extent it implies terms that this answering party cannot interpret
25 while understood in the context of these requests or this litigation. Where possible,
26 this answering party has made reasonable assumptions as to the Propounding
27 Party's intended meaning and has responded accordingly, while preserving the
28 objection as to the vagueness and ambiguity.

1 7. Without waiving said objections, Responding Party states as follows:

2 **SPECIFIC RESPONSES**

3 **SPECIAL INTERROGATORY NO. 1:**

4 IDENTIFY each of the "super-agents" referenced at page 72 of the
5 PUBLICATION.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

7 Objection. This interrogatory improperly seeks to have the Defendant
8 disclose the identity of covert agents of the United States government and engage
9 in criminal conduct by making such disclosure in violation of the provisions of 50
10 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
11 Defendant disclose classified information of the United States government and
12 engage in criminal conduct by making such disclosure in violation of the
13 provisions of 18 U.S.C. §798(a), (b) and (c). Without waiving said objection, this
14 Defendant responds to this interrogatory as follows:

- 15 1. David Smith: Federal Bureau of Investigation Field Office, 601 W. 4th
16 Street, Washington, DC; (202) 278-2000.
17 2. John Moynihan; JFM & Associates, LLC 48 Kenwood, Worchester, MA
18 01665; (313) 410-6872.

19 **SPECIAL INTERROGATORY NO. 2:**

20 IDENTIFY each member of the "League of Shadows" referenced at page 72
21 of the PUBLICATION.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

23 Objection. This interrogatory improperly seeks to have the Defendant
24 disclose the identity of covert agents of the United States government and engage
25 in criminal conduct by making such disclosure in violation of the provisions of 50
26 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
27 Defendant disclose classified information of the United States government and
28 engage in criminal conduct by making such disclosure in violation of the

1 provisions of 18 U.S.C. §798(a), (b) and (c). Without waiving said objection, this
2 Defendant responds to this interrogatory as follows:

- 3 1. David Smith: Federal Bureau of Investigation Field Office, 601 W. 4th
4 Street, Washington, DC; (202) 278-2000.
- 5 2. John Moynihan; JFM & Associates, LLC 48 Kenwood, Worchester, MA
6 01665; (313) 410-6872

7 **SPECIAL INTERROGATORY NO. 3:**

8 IDENTIFY each PERSON in the "group" YOU purportedly met with in or
9 around November 2021 when YOU "went back to the Middle East," including but
10 not limited to the PERSON described as "a very special Iranian figure, an old
11 friend," as stated at page 72 of the PUBLICATION.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

13 Objection. This interrogatory improperly seeks to have the Defendant
14 disclose the identity of covert agents of the United States government and engage
15 in criminal conduct by making such disclosure in violation of the provisions of 50
16 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
17 Defendant disclose classified information of the United States government and
18 engage in criminal conduct by making such disclosure in violation of the
19 provisions of 18 U.S.C. §798(a), (b) and (c).

20 **SPECIAL INTERROGATORY NO. 4:**

21 IDENTIFY all DOCUMENTS concerning the trip "back to the Middle East"
22 that YOU claim to have made "in November 2021," as stated at page 72 of the
23 PUBLICATION.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

25 Objection. This interrogatory improperly seeks to have the Defendant
26 disclose the identity of covert agents of the United States government and engage
27 in criminal conduct by making such disclosure in violation of the provisions of 50
28 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the

1 Defendant disclose classified information of the United States government and
2 engage in criminal conduct by making such disclosure in violation of the
3 provisions of 18 U.S.C. §798(a), (b) and (c).

4 **SPECIAL INTERROGATORY NO. 5:**

5 Explain the "mechanism I am not going to explain here" by which YOU
6 purportedly "became aware" that "Hunter Biden was reaching out to the Iranian
7 government in the fall of 2021," as stated at page 72 of the PUBLICATION.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

9 Objection. This interrogatory improperly seeks to have the Defendant
10 disclose the identity of covert agents of the United States government and engage
11 in criminal conduct by making such disclosure in violation of the provisions of 50
12 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
13 Defendant disclose classified information of the United States government and
14 engage in criminal conduct by making such disclosure in violation of the
15 provisions of 18 U.S.C. §798(a), (b) and (c).

16 **SPECIAL INTERROGATORY NO. 6:**

17 IDENTIFY "the son of the Minister of Defense of Pakistan" referenced at
18 page 72 of the PUBLICATION.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

20 Objection. This interrogatory improperly seeks to have the Defendant
21 disclose the identity of covert agents of the United States government and engage
22 in criminal conduct by making such disclosure in violation of the provisions of 50
23 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
24 Defendant disclose classified information of the United States government and
25 engage in criminal conduct by making such disclosure in violation of the
26 provisions of 18 U.S.C. §798(a), (b) and (c).

27 **SPECIAL INTERROGATORY NO. 7:**

28 Please state all facts that support YOUR assertion that "Hunter Biden was

1 reaching out to the Iranian government in the fall of 2021 with the following offer:
2 'You Iranians have \$8 billion frozen in a bank account in South Korea. My father
3 will unfreeze it in return for \$800 million being funneled into a numbered account
4 for us. And if you do this deal with us, it will lubricate other negotiations which
5 have recently started between us.' By that, the Iranians believed that Hunter meant
6 the JCPOA talks, which had restarted in Geneva a month or two previously. In
7 other words, something along the lines of, 'Pay us \$100 million and we let you
8 keep 10 nukes, \$200 million for 20 nukes,' etc. But I am making up the pricing,"
9 as set forth on page 72 of the PUBLICATION.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

11 Objection. This interrogatory improperly seeks to have the Defendant
12 disclose the identity of covert agents of the United States government and engage
13 in criminal conduct by making such disclosure in violation of the provisions of 50
14 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
15 Defendant disclose classified information of the United States government and
16 engage in criminal conduct by making such disclosure in violation of the
17 provisions of 18 U.S.C. §798(a), (b) and (c).

18 **SPECIAL INTERROGATORY NO. 8:**

19 Describe the information concerning PLAINTIFF that YOU "pilfered" from
20 someone in Iran and turned over to the U.S. government, as YOU claimed in
21 YOUR interview on *The Absolute Truth* with Emerald Robinson, which aired on or
22 about May 11, 2023.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

24 Objection. This interrogatory improperly seeks to have the Defendant
25 disclose the identity of covert agents of the United States government and engage
26 in criminal conduct by making such disclosure in violation of the provisions of 50
27 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
28 Defendant disclose classified information of the United States government and

engage in criminal conduct by making such disclosure in violation of the provisions of 18 U.S.C. §798(a), (b) and (c).

SPECIAL INTERROGATORY NO.9:

IDENTIFY each PERSON to whom YOU purportedly turned over information concerning PLAINTIFF that YOU "pilfered" from someone in Iran, as YOU claimed in YOUR interview on The Absolute Truth with Emerald Robinson, which aired on or about May 11, 2023.

RESPONSE TO SPECIAL INTERROGATORY NO. 9:

Objection. This interrogatory improperly seeks to have the Defendant disclose the identity of covert agents of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 50 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 18 U.S.C. §798(a), (b) and (c). Without waiving said objection, this Defendant responds to this interrogatory as follows:

3. David Smith: Federal Bureau of Investigation Field Office, 601 W. 4th Street, Washington, DC; (202) 278-2000.

4. John Moynihan; JFM & Associates, LLC 48 Kenwood, Worchester, MA 01665; (313) 410-6872

SPECIAL INTERROGATORY NO.10:

Describe the "copy of the Iranian materials" that YOU claimed YOU "got to Congress a few days ago" in YOUR interview on The Absolute Truth with Emerald Robinson, which aired on or about May 11, 2023.

RESPONSE TO SPECIAL INTERROGATORY NO. 10:

Objection. This interrogatory improperly seeks to have the Defendant disclose classified information of the United States government and engage in criminal conduct by making such disclosure in violation of the provisions of 18

1 U.S.C. §798(a), (b), and (c).

2 **SPECIAL INTERROGATORY NO.11:**

3 IDENTIFY each PERSON to whom YOU provided the "copy of the Iranian
4 materials" that YOU claimed YOU "got to Congress a few days ago," as YOU
5 claimed in YOUR interview on The Absolute Truth with Emerald Robinson, which
6 aired on or about May 11, 2023.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

8 Objection. This interrogatory improperly seeks to have the Defendant
9 disclose the identity of covert agents of the United States government and engage
10 in criminal conduct by making such disclosure in violation of the provisions of 50
11 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
12 Defendant disclose classified information of the United States government and
13 engage in criminal conduct by making such disclosure in violation of the
14 provisions of 18 U.S.C. §798(a), (b) and (c).

15 **SPECIAL INTERROGATORY NO. 12:**

16 Describe "all that original stuff that was "recreated" for YOU by "the
17 'hacktivists,'" which YOU claimed to have in YOUR possession during YOUR
18 interview on The Absolute Truth with Emerald Robinson, which aired on or about
19 May 11, 2023.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

21 The Defendant has the Hunter Biden lap top contents.

22 **SPECIAL INTERROGATORY NO. 13:**

23 IDENTIFY each PERSON who interviewed YOU for the PUBLICATION.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

25 Michael Flynn.

26 **SPECIAL INTERROGATORY NO. 14:**

27 If YOU contend that the DEFAMATORY STATEMENTS are true, please
28 state all facts that support YOUR contention.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

2 The Defendant did not make any defamatory statements. The statements are
3 true. Defendant verified the facts with the assistance of Mr. David Smith and Mr.
4 John Moynihan.

5 **SPECIAL INTERROGATORY NO. 15:**

6 If YOU contend that the DEFAMATORY STATEMENTS are true, please
7 IDENTIFY all PERSONS with knowledge of their truth or falsity.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

9 The Defendant did not make any defamatory statements. The statements that
10 are the subject of this action are true. The witnesses that have knowledge of their
11 truth are as follows:

- 12 1. David Smith: Federal Bureau of Investigation Field Office, 601 W. 4th
13 Street, Washington, DC; (202) 278-2000.
- 14 2. John Moynihan; JFM & Associates, LLC 48 Kenwood, Worchester, MA
15 01665; (313) 410-6872.
- 16 3. Defendant

17 **SPECIAL INTERROGATORY NO. 16:**

18 If YOU contend that the DEFAMATORY STATEMENTS are true, please
19 IDENTIFY all DOCUMENTS that support YOUR contention.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

21 The Defendant did not make any defamatory statements. The statements that
22 are the subject of this action are true. The documents which show they are true are
23 set forth as follows:

- 24 1. The Affidavit of John Moynihan
- 25 2. The recording of the telephone calls related to same.

26 **SPECIAL INTERROGATORY NO. 17:**

27 Please IDENTIFY each instance in which the DEFAMATORY
28 STATEMENTS were published or republished, including the date of publication,

1 the place of publication, the PERSONS to whom publication was made, and the
2 manner of the publication (in person, telephonic, online, etc.).

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

4 This answering defendant did not make any defamatory statements.

5 **SPECIAL INTERROGATORY NO. 18:**

6 Please IDENTIFY each and every source upon which YOU relied when
7 making the DEFAMATORY STATEMENTS.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

9 Objection. This interrogatory improperly seeks to have the Defendant
10 disclose the identity of covert agents of the United States government and engage
11 in criminal conduct by making such disclosure in violation of the provisions of 50
12 U.S.C. §3121(a), (b), and (c). This interrogatory improperly seeks to have the
13 Defendant disclose classified information of the United States government and
14 engage in criminal conduct by making such disclosure in violation of the
15 provisions of 18 U.S.C. §798(a), (b) and (c). Without waiving said objection, the
16 Defendant responds as follows:

17 Defendant did not make any Defamatory Statements. The statements that the
18 Defendant made were done in reliance on information set forth in the Affidavit of
19 John Moynihan, information provided to him by David Smith and the telephone
20 recording.

21 **SPECIAL INTERROGATORY NO. 19:**

22 Please describe in detail the circumstances surrounding the interview of
23 YOU that appears in the PUBLICATION, including where the interview occurred,
24 the PERSONS who were present, how it was scheduled, how it was conducted,
25 whether it was recorded, and any follow up that occurred between the date(s) of the
26 interview and its appearance in the PUBLICATION.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

28 Defendant prepared a composite interview and provided it to Anil Anwar.

1 Dated: August 6, 2024

LAW OFFICES OF MICHAEL C. MURPHY

2
3 By: /s/ Michael C. Murphy, Esq.

4
5 Michael C. Murphy, Esq.
6 Michael C. Murphy, Jr., Esq.
7 Attorneys for Defendant,
8 Patrick M. Byrne
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VERIFICATION

STATE OF FLORIDA, COUNTY OF JUPITER

I have read the foregoing **DEFENDANT PATRICK M. BYRNE'S FURTHER
RESPONSES TO SPECIAL INTERROGATORIES, SET ONE TO PLAINTIFF ROBERT
HUNTER BIDEN**, and know its contents.

I am informed and believe that the matters stated in the foregoing documents are true.

Executed on August 9th, 2024, at Abu Dhabi, UAE (City/State).

I declare under penalty of perjury under the laws of the United States of America that the
foregoing is true and correct.

Patrick Byrne

Patrick Byrne

Print Full Name

Signature

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

PROOF OF SERVICE
UNITED STATES OF AMERICA

I am employed and am a resident of the County of Ventura, State of California.

I am over the age of 18 and not a party to the within action. My business name and address is as follows:

Law Offices of Michael C. Murphy
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

On August 9, 2024, I served the foregoing document(s) on Opposing Counsel in this action described as follows:

**1. DEFENDANT PATRICK M. BYRNE'S FURTHER RESPONSES TO
PLAINTIFF ROBERT HUNTER BIDEN'S FIRST SET OF SPECIAL
INTERROGATORIES**

_____ by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list.

_____ by placing a copy of the original enclosed in sealed envelopes addressed as follows ("U.S. Mail"):

 X by placing copies of the original through electronic transmission ("e-mail") to all parties appearing on the electronic service list as follows:

_____ by placing copies of the original through facsimile transmission ("fax") to all parties appearing on the service list as follows:

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The sender's name and email address are as follows:

Name: Michael C. Murphy, Esq.
Email: Michael@murphlaw.net.

____ (State) I declare under penalty of perjury under the laws of the State of California and the United States of America that the above is true and correct.

X (Federal) I declare that I am employed in the office as a member of the bar of this court at whose direction the service was made.

Executed on August 9, 2024 at Westlake Village, California.

By: /s/ Michael C. Murphy, Esq.